

UNITED STATES BANKRUPTCY COURT
MIDDLE DISTRICT OF FLORIDA
ORLANDO DIVISION

In re:

Soogie and Ramdhanie Doodnath
Debtor(s).

CASE NO.: 11-16718

NOTICE OF OPPORTUNITY TO OBJECT AND FOR HEARING

Pursuant to Local Rule 2002-4, the Court will consider this pleading without further notice or hearing UNLESS a party in interest files an objection within twenty-one (21) days from the service of this pleading. If you object to the relief requested herein, you must file your objection with the Clerk of the Court at 135 W. Central Blvd., Ste 950, Orlando, FL 32801 and serve a copy of on the undersigned at the address set forth below. If you file and serve an objection within the time permitted, the court will schedule a hearing and you will be notified. If you do not file an objection within the time permitted, the Court will consider that you do not oppose the granting of the relief requested herein, will proceed to consider this pleading without further notice of hearing and may grant the relief requested.

MOTION TO VALUE REAL TIME RESOLUTIONS INC
INVESTMENT PROPERTY LOCATED AT
2111 Carbine Court, Kissimmee, Florida 34743-3615

COMES NOW the Debtors, SOOGIE AND RAMDHANIE DOODNATH, by and through the undersigned counsel and files this Motion to Value pursuant to Section 506 (a) of the Bankruptcy Code, and in support thereof would state as follows:

This Motion addresses the Investment property located at 2111 Carbine Court, Kissimmee, Florida 34743-3615, and the second mortgage held by

REAL TIME SOLUTIONS
INVESTMENT PROPERTY LOCATED AT
2111 Carbine Court, Kissimmee, Florida 34743-3615

1. The Debtor believes the property is worth \$113,000.00, and has based her opinion an appraisal done by Wells Fargo Bank, N.A. who holds the First Mortgage on said property.

2. There are two mortgages which is secured by the investment property located at 2111 Carbine Court, Kissimmee, Florida 34743-3615 described as:

REMINGTON POINTE SUB PB 8 PG 178-181 LOT 78

“The Liens”

1. There is a first mortgage held by Wells Fargo Bank N.A. with an approximate balance of \$202,817.04.
2. The second mortgage is held by Real Time Resolutions, Inc, with an approximate balance of \$31,878.55.
3. The fair market value of the property is \$113,000.00.
4. This property is investment property and is not the Debtor’s homestead.
5. The second mortgage held by Real Time Resolutions, Inc is unsecured because there is no value above the balance of the first mortgage held by Wells Fargo Bank, N.A.

WHEREFORE, Debtors request this Honorable Court value the investment property at fair market value and modify the mortgage owed to Real Time Resolutions, Inc. Services, Inc., to \$0.00 at 0% interest or otherwise strip the second mortgage lien, and such other relief that may be just and proper in the circumstances.

CERTIFICATE OF SERVICE

A true and correct copy of the foregoing has been sent by U.S. Mail or by electronic transmission to ECF users this 30th day of May, 2012 to: Laurie K. Weatherford, Trustee, P. O. Box 3450, Winter Park, Florida 32790; Debtor, Soogie and Ramdhanie Doodnath 3623 Bristol Cone Lane, Saint Cloud, Florida 34772; and Real Time Resolutions, Inc, 1750 Regal Row, Suite 120, PO Box 36655, Dallas TX 75235,

Attn. President, Officer, Manager, Managing Agent, where creditor routinely does business.

/s/ David L. Robold
David L. Robold, Esquire
Attorney for the Debtors
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